

EXHIBIT 3

**REDACTED VERSION
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
)
Plaintiff,)
)
vs.)Case No.:
)3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO TRUCKING)
LLC,)
)
Defendants.)

ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF JAMES HASLIM
San Francisco, California
Tuesday, April 18, 2017
Volume 1

Reported by:
RACHEL FERRIER, CSR No. 6948
Job No. 2597892
PAGES 1 - 112

1 Q That's a -- that's a good point, so let me just
2 actually ask that.

3 Were you aware, before you joined Otto, about
4 Otto's Li- -- LiDAR technology development efforts?

5 A No.

6 Q So you joined Tyto -- excuse me.

7 You joined Otto in May 2016; right?

8 A Yes.

9 Q When you showed up at your new company --

10 A Mm-hmm.

11 Q -- tell me what happened in terms of what you
12 understood your new job responsibilities were going to
13 be.

14 A When I joined Otto, my job description was senior
15 mechanical engineer and LiDAR lead. That would imply
16 that I was responsible for developing a LiDAR sensor.

17 Q Who did you report to?

18 A When I joined Otto, I reported to Anthony
19 Levandowski.

20 Q And who else was on the LiDAR team with you at
21 that time?

22 A At the time I joined, we had a number of
23 employees. Since I believe you are asking for a list,
24 I'm going to -- I'm not going to get all the names, I'm
25 sure, but I can try.

1 There would be myself, Mike Carisoff, Matt
2 Palomar, Tre Long [phonetic], Dan Gruver, Gaetan
3 Pennecot, Max Levandowski, Daniel Ratner. That's all I
4 can recall right now.

5 Q And what LiDAR technology at Otto existed when
6 you joined in May 2016?

7 A I would have to say that there was no LiDAR
8 sensor at the time that I joined Otto that I was aware
9 of, and there were employees that were on the LiDAR
10 team, apparently, before I joined.

11 Q What were they working on?

12 A They were working on a couple projects. One of
13 those projects was some sort of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED].

16 Q Did that have a name?

17 A No, not that I'm aware of.

18 Q Okay. Can we just give it a name for the
19 purposes of our discussion today, whatever name you feel
20 comfortable with, just so I can refer to it?

21 A [REDACTED] I guess.

22 Q So [REDACTED] did they show you the designs for
23 [REDACTED]?

24 A At the time, I don't think I saw those designs,
25 no.

1 A Yes.

2 Q Who came up with the [REDACTED]

3 [REDACTED]
4 A I was working with the mechanical engineer doing
5 the optical cavity design, and I recommended he purchase

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

9 Q Who were you working with?

10 A That was Max Levandowski, the mechanical
11 engineer.

12 Q And is he related to Anthony Levandowski?

13 A Yes.

14 Q How is he related?

15 A I understand they are brothers.

16 Q And so Max Levandowski also works on the LiDAR
17 team; is that right?

18 A Yes.

19 Q So you and Mr. Levandowski's brother, Max, came
20 up with the

21 [REDACTED]
22 [REDACTED] is that right?

23 MR. KIM: Objection; form.

24 THE WITNESS: Max and I came up with [REDACTED]
[REDACTED]

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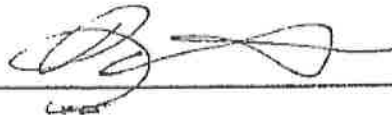
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3
4 I, the undersigned, a Certified Shorthand
5 Reporter of the State of California, do hereby certify:

6 That the foregoing proceedings were taken before
7 me at the time and place herein set forth; that any
8 witnesses in the foregoing proceedings, prior to
9 testifying, were placed under oath; that a verbatim
10 record of the proceedings was made by me using machine
11 shorthand which was thereafter transcribed under my
12 direction; further, that the foregoing is an accurate
13 transcription thereof.

14 I further certify that I am neither financially
15 interested in the action nor a relative or employee of
16 any attorney or any of the parties.

17 IN WITNESS WHEREOF, I have this date subscribed
18 my name.

19
20 Dated: April 18, 2017

21
22 
23

24 RACHEL FERRIER

25 CSR No. 6948